

**DECLARATION OF AMIRALI Y. HAIDRI**

I, Amirali Y. Haidri, being of full age, do hereby depose and say the following under pains and penalties of perjury under the laws of the United States and the State of Michigan.

1. I am a citizen of the United States.
2. I am an attorney licensed to practice law in the States of New York and New Jersey.
3. I am a patent attorney licensed to represent patent clients at the United States Patent and Trademark Office ("USPTO"). I became licensed in 1978.
4. I was awarded my undergraduate B.S. degree in chemical engineering from the University of Leeds, United Kingdom in 1971. I graduated with honors.
5. I was awarded my J.D. degree from New York Law School in 1980. I graduated *cum laude* in the upper 15% of my class. I was awarded the D. George Levine Memorial award for the highest grade in the law of real property.
6. I was awarded my M.S. degree in organic chemistry from New York University in 1983. My coursework included analytical chemistry, biochemistry, stereochemistry, and nuclear magnetic resonance imaging.

The courses included intensive hands-on laboratory work. My thesis was titled, "Transition Metal Catalyzed Synthesis Gas Homologation of Carboxylic Acids."

7. During the summers of 1967-1968, I worked for Quantum, Inc. in Wallingford, CT. There, I performed research and development in polymer chemistry. My work involved preparation of experimental formulations.
8. During the academic year 1968-1969, I was employed by the University of Leeds in the Physics Department.
9. Between 1971 and 1972, I worked for W.P. Thompson & Co. as a technical associate.
10. From 1972 until 1981, I was employed by Hazeltine and Lake in New York as an associate and Director of the Trademark Department.
11. From 1981 until 1983, I worked for Texaco Development Corporation in White Plains, NY. At Texaco, I prosecuted patents for inventions involving chemical technology.
12. From 1983 until 1984, I was employed as a patent attorney by Lever Brothers Company in Edgewater, NJ. During this period, I worked alongside the chemists at their research and development laboratories. I worked with them to take their inventive concepts and to turn them into

patentable inventions. I helped them reduce their ideas to practice. During this time, I was involved with inventions of soaps, fragrances, foods, and over-the-counter pain relievers. Lever Brothers successfully marketed the inventions on which I worked under the brand names of Aunt Jemima, SHEDDS, and Aunt Millie. I wrote many patent specifications during that period. As an example, I wrote the entire patent specification for an invention by Thomas Ritchey titled, "Method Of Relieving Pain And Inflammatory Conditions Employing Substituted Salcylamides." I also worked alongside the chemist who developed the Dove Beauty Bar.

13. From 1984 until the present time, I devoted my activities to building a law practice. I still am an active patent practitioner, and the patents that I prosecute are all involved with organic chemistry.
14. In September 2019, I filed a lawsuit representing Trutek Corp against Matrixx Initiatives, Inc. (3:19-cv-17647 (D. N.J.)) Matrixx manufactured and sold a product under the brand name ZICAM, which was a liquid nasal product claiming to relieve the symptoms of illness from cold and flu viruses. The lawsuit alleged that the ZICAM products infringe upon the claims of Trutek's U.S. Patent No. 8,163,802 ("the '802 Patent"). During the time that the lawsuit was active, Trutek

had to defend against an *inter-partes* review ("IPR") of the '802 Patent at the USPTO. Trutek also filed several IPR's against Matrixx owned patents. That lawsuit settled in November 2020 under conditions favorable to Trutek.

15. I am very familiar with the technology of the '802 Patent, having been involved with it for several years. I have been familiar with cationic agents and biocides for many years prior to filing the lawsuit. I am also familiar with surfactants, thickeners, and adhesives. I understand the principles of electrostatic attraction and repulsion. I am very familiar with adjusting viscosity, adhesion, and cohesion of a chemical formulation.

I make this declaration and the statements herein under pains and penalties of perjury under the laws of the United States and the State of Michigan.



Amirali Y. Haidri

Dated: May 8, 2023